



Representing Household & Institutional Products

Aerosol - Air Care - Cleaners - Polishes
Automotive Care - Antimicrobial - Pest Management

Testimony of the
CONSUMER SPECIALTY PRODUCTS ASSOCIATION
in OPPOSITION to
SENATE BILL 914
AN ACT CONCERNING THE APPLICATION OF PESTICIDES AT MUNICIPAL PARKS
submitted to the
JOINT ENVIRONMENT COMMITTEE
STATE OF CONNECTICUT
FEBRUARY 25, 2013

Submitted by: Sean Moore, Director, State Affairs – East Region

Chairman Meyer, Chairwoman Gentile and distinguished members of the Joint Environment Committee, my name is Sean Moore and I am Director of State Affairs for the Eastern United States at the Consumer Specialty Products Association (CSPA). CSPA appreciates this opportunity to submit testimony **in opposition to Senate Bill 914** – a bill that would prohibit the use of pesticides at municipal parks.

CSPA is the premier trade association representing the interests of some 230 companies engaged in the manufacture, formulation, distribution and sale of \$80 billion annually in the U.S. of hundreds of familiar consumer products that help household and institutional customers create cleaner and healthier environments. Our products include disinfectants that kill germs in homes, hospitals and restaurants; candles, and fragrances and air fresheners that eliminate odors; pest management products for home, garden and pets; cleaning products and polishes for use throughout the home and institutions; products used to protect and improve the performance and appearance of automobiles; aerosol products and a host of other products used every day. Through its product stewardship program, Product Care®, and scientific and business-to-business endeavors, CSPA provides its members a platform to effectively address issues regarding the health, safety, sustainability and environmental impacts of their products. For more information, please visit www.cspa.org.

CSPA and its members support the implementation of Integrated Pest Management (IPM) programs to evaluate all reasonable means of preventing and mitigating pest infestations. IPM is recognized internationally as a way to manage pests effectively and in an environmentally sensitive manner. As explained by the United States Environmental Protection Agency, IPM includes the judicious use of pesticides:

Integrated Pest Management (IPM) is an effective and environmentally sensitive approach to pest management that relies on a combination of common-sense practices. IPM programs use current, comprehensive information on the life cycles of pests and their interaction with the environment. This information, in combination with available pest control methods, is used to manage pest damage by the most economical means, and with the least possible hazard to people, property, and the environment.

The IPM approach can be applied to both agricultural and non-agricultural settings, such as the home, garden, and workplace. IPM takes advantage of all appropriate pest management options **including, but not limited to, the judicious use of pesticides** [*emphasis added*]. In contrast, *organic* food production applies many of the same concepts as IPM but limits the use of pesticides to those that are produced from natural sources, as opposed to synthetic chemicals.¹

Indeed, pesticides are not the cornerstone of IPM, which relies on a variety of approaches and an understanding of the conditions that breed pest infestations, but pesticides are an important component that should not be removed by legislation such as SB 914. Connecticut has been afforded a glimpse of the unintended consequences of prohibitions similar to what is proposed in this legislation, as the Connecticut Association of Boards of Education, the Connecticut Council of Small Towns and Parks and Recreation Directors from municipalities across the state testified before the Planning and Development Committee last year:

Many districts have sport fields which have deteriorated to such a degree that play on them could cause injury because the grass is patchy and the dirt spots are too prevalent. Boards of education have adopted integrated pest management plans and the best implementation of the plans has been derailed by the ban on pesticides...All of the plantings that have also made the grounds so attractive have suffered and now are not worth the financial investment to replace.²

COST [Connecticut Council of Small Towns] has heard from numerous towns throughout Connecticut whose athletic fields, fence lines and schools grounds simply cannot be maintained adequately³ and safely due to the restrictions on the use of Integrated Pest Management Plans.³

Healthy green space is important to maintain

Integrated Pest Management plans are aimed at maintaining healthy green spaces once they have been established. The testimony by the Connecticut Association of Boards of Education and the Connecticut Council of Small Towns illustrate the difficulty in maintaining green spaces once pesticides have been removed from the IPM "toolbox." Healthy turf has a number of environmental benefits, which underscore the need to maintain those green spaces:

- **Improved water quality** – grass filters storm water runoff, helping to slow and purify water before it is returned to surface and aquifer sources,
- **Reduced sedimentation and soil erosion** – grass provides a thick root structure, holding soil

¹ United States Environmental Protection Agency IPM Factsheet accessed online on Thursday, February 14, 2013
<http://www.epa.gov/pesticides/factsheets/ipm.htm>
<http://www.epa.gov/pesticides/factsheets/ipm.htm>

² Testimony of the Connecticut Association of Boards of Education, Inc. in support of HB 5155 (2012), submitted to Connecticut's Joint Planning and Development Committee, February 22, 2012

³ Testimony of the Connecticut Council of Small Towns in support of HB 5155 (2012), submitted to Connecticut's Joint Planning and Development Committee, February 22, 2012

- in place during storm events,
- **Improved air quality** – healthy grass crowds out allergy causing plants, reducing exposure to allergens.

Pesticide products used in Connecticut are highly regulated

Pesticide products sold and used in Connecticut must be registered with EPA and the Connecticut Department of Energy and Environmental Protection (DEEP). Federal law requires that before selling or distributing a pesticide in the United States, a person or company must obtain registration, or license from EPA. Before registering a new pesticide or new use for a registered pesticide, EPA must first ensure that the pesticide, when used according to label directions, can be used with a reasonable certainty of no harm to human health and without posing unreasonable risks to the environment. To make such determination, EPA requires more than 100 different scientific studies and tests from applicants. As explained on the EPA website:

The process of registering a pesticide is a scientific, legal, and administrative procedure through which EPA examines the ingredients of the pesticide; the particular site or crop on which it is to be used; the amount, frequency, and timing of its use; and storage and disposal practices. In evaluating a pesticide registration application, EPA assesses a wide variety of potential human health and environmental effects associated with use of the product. The producer of the pesticide must provide data from tests done according to EPA guidelines.

These tests evaluate whether a pesticide has the potential to cause adverse effects on humans, wildlife, fish, and plants, including endangered species and non-target organisms, as well as possible contamination of surface water or ground water from leaching, runoff, and spray drift. Potential human risks range from short-term toxicity to long-term effects such as cancer and reproductive system disorders. EPA also must approve the language that appears on each pesticide label. A pesticide product can only be used legally according to the directions on the labeling accompanying it at the time of sale. Following label instructions carefully and precisely is necessary to ensure safe use.

The Pesticide Management Program at DEEP regulates the use of pesticides in Connecticut.

Conclusion

CSPA and our members support the responsible and judicious use of pesticides and the use of IPM programs to mitigate and prevent pest infestations. Senate Bill 914 would not make Connecticut parks safer. Instead, the bill would undermine the current pest management programs in place.

CSPA respectfully *urges your NO vote on SB 914*. Thank you for considering our position on this exceedingly important issue. I apologize that I am unable to appear in-person to present this testimony, as I had a previously scheduled travel commitment, but welcome any questions or discussion of CSPA's testimony. Please contact Jean Cronin (Hughes & Cronin Public Affairs Strategies), CSPA's in-state representative, at 860-347-9955 or jcronin@hughesandcronin.com.